III. REMARKS

The Examiner is thanked for extending the courtesy of a telephone interview on September 8, 2010. During the interview it was agreed that in the first full paragraph on page 5 of the last office action "step S15" should be "box 5".

Applicants respectfully submit that claims 1, 2 and 15-19 are not obvious by Fujiwara (US 6,301,710, "Fujiwara") in view of Tsumara (US 5,842,023, "Tsumara") under 35 USC 103(a).

Claim 1 recites "...embodied on a computer readable medium...". The Examiner has cited column 1, lines 20-23, as disclosing this feature. However, while it is true that this portion of Fujiwara discloses programs and substitute registry as stated by the Examiner, it is respectfully submitted that there is absolutely no disclosure of a computer readable medium there or anywhere in Fujiwara.

Claim 1 recites "...a system manager; and at least one platform controller coupled to the system manager...". The Examiner has cited column 1, lines 29-31, for this feature. While programs are disclosed which control computer systems, there is no disclosure of a system manager or a platform controller.

Claim 1 further recites "...the system manager configured to: collect attribute data including copyright data pertaining to software from each platform controller...". The Examiner has cited Figure 4 and column 6, lines 15-16 and 22-24, for this feature. It is respectfully submitted that the claimed feature is not disclosed since "possess" is not the same as "collect". It is respectfully submitted that "collecting" means to gather together, while "selecting" means to chose apart, i.e., "selecting" means not to collect everything available. Thus the words are not equivalents.

Claim 1 further recites "...process the copyright data into a list of copyright data for the system...". The Examiner cites Figure 9 and column 10, lines 18-21. However, there is no disclosure of the claimed list therein.

Claim 1 also recites "...a user interface connected to the system manager for displaying the collected attribute data in the list to a user." The Examiner has cited Figure 3; and column 6, lines 51-53. However, all that is disclosed therein is that details of the individual software

programs included in client registries 355 can be viewed and accessed. This is not the same as the "list" of "copyright data" that is collected recognized and processed as claimed by Applicant.

In the first full paragraph on page 5 the Examiner concedes that "Fujiwara does not explicitly teach, recognize the copyright data in the attribute data". However, he cites Tsumara (Figures 5, column 3, lines 14-26, and box 15) as disclosing this feature. While a copyright information manager 5 is disclosed, which manager, along with other elements, controls the supply of information, nothing is disclosed about the presently claimed "process the copyright data into a list of copyright data for the system". Thus, even if Fujiwara and Tsumara are combined, the result is not the claimed invention.

At least for these reasons, Applicants submit that the combination of Fujiwara and Tsumara does not make obvious independent claim 1 and dependent claims 2 and 15-19.

Regarding claim 15, the cited portion of Fujiwara discloses a plurality of client systems. However, it fails to disclose simultaneously collecting data as claimed. For this additional reason, claim 15 is patentable.

Applicants respectfully submit that claim 20 is patentable over Fujiwara in view of Tsumara and Saito.

Saito also does not disclose the above-discussed limitations. Thus, the combination of Fujiwara, Teare and Saito fails to result in the claimed limitations.

Therefore, the combination of Fujiwara, Teare and Saito fails to render claim 20 unpatentable.

Applicants respectfully submit that claims 3-7, 9-13 and 21 are patentable over the combination of Fujiwara and Teare et al. (US 6,151,624, "Teare") under 35 USC 103(a).

The combination of Fujiwara and Teare fails to disclose or suggest the recited "collecting" step of claims 3 and 12. While Teare does disclose "polling", this is not the same as "collecting". In particular, "polling" means to take a count, while, as explained above, "collecting" means to gather together. In the Advisory Action the Examiner states that the terms are equivalent given their broadest reasonable interpretation. However, this must be consistent with the disclosure and how one of ordinary skill in the art would interpret the terms, see MPEP 2111 and *In re Cartright*, 49 USPQ2d 1464, 1468. Here, the Examiner is expanding the terms beyond their

reasonable meaning. Further, since the objects of Fujiwara and Teare are so different, it is not obvious to combine them. This is especially true since they involve obviously complex arts, see *KSR International Co. v. Teleflex Inc.*, 82 USPQ 2d 1385, 1396.

Claim 4 recites polling during power on. The Examiner cites Teare, column 5, lines 9-11. However, the quoted language discloses nothing about what happens during power on. For this additional reason, claim 4 is patentable.

Regarding claim 5, the Examiner cites Teare, column 18, lines 21-24. However, absolutely nothing is disclosed therein about the claimed polling of at least one of the at least two platform controls when polling is initiated. For this additional reason, claim 5 is patentable.

Regarding claim 6, the cited portions of Fujiwara disclose what attributes browser program 330 may have (col. 6, ll. 15-16) and what configuration files 340 may include (col. 6, ll., 22-24). These portions have no disclosure of collecting copyright information as presently claimed. For this additional reason, claimed 6 is patentable.

Regarding claim 7, this cited portion of Fujiwara mention license information. However, there is no disclosure of collection license information as presently claimed. For this additional reason, claim 7 is patentable.

Regarding claim 9, the cited portion of Fujiwara disclose displaying, However there is no disclosure of the claimed automatically displaying. For this additional reason, claim 9 is patentable.

Regarding claim 10, the cited portion of Fujiwara discloses displaying. However, there is no disclosure of the claimed manually displaying. For this additional reason, claim 10 is patentable.

Regarding claim 11, the cited portion of Fujiwara discloses what miscellaneous information 918 can include. However the cited portion fails to disclose displaying only non-copyright data as claimed. For this additional reason, claim 11 is patentable.

Regarding claim 15, the cited portion of Fujiwara discloses a plurality of client systems. However, it fails to disclose simultaneously collecting data as claimed. For this additional reason claim 15 is patentable.

Therefore, the combination of Fujiwara and Teare fails to render claims 3-7, 9-13, 15-19 and 21 unpatentable.

Applicants respectfully submit that claims 8 and 14 are patentable over the combination of Fujiwara, Teare and Saito et al. (US 2002/073035, "Saito") under 35 USC 103(a).

The combination of Fujiwara, Teare and Saito fails to disclose or suggest the above-discussed and claimed limitations.

Therefore, the combination of Fujiwara, Teare and Saito fails to render claims 8 and 14 unpatentable.

For all of the foregoing reasons, it is respectfully submitted that all of the claims now present in the application are clearly novel and patentable over the prior art of record, and are in proper form for allowance. Accordingly, favorable reconsideration and allowance is respectfully requested. Should any unresolved issues remain, the Examiner is invited to call Applicants' attorney at the telephone number indicated below.

The Commissioner is hereby authorized to charge payment for any fees associated with this communication or credit any over payment to Deposit Account No. 24-0037.

Respectfully submitted,

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